

Gail Young - 10/20/04

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y, By and  
Through Her Next Friend,  
James D. Johnson, et al.

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:04CV25LN

HALEY BARBOUR, As Governor  
Of the State of Mississippi;  
DONALD TAYLOR, as Executive  
Director of the Department of  
Human Services; and BILLY MANGOLD,  
As Director of the Division of  
Children's Services

DEFENDANTS

DEPOSITION OF GAIL YOUNG

Taken at the instance of the Plaintiff at the  
offices of Bradley Arant, LLP, One Jackson Place,  
188 E. Capitol Street, Suite 450, Jackson,  
Mississippi, on Wednesday, October 20, 2004,  
beginning at approximately 1:00 p.m.

APPEARANCES:

ERIC E. THOMPSON, ESQ.  
MARCIA ROBINSON LOWRY, ESQ.  
Children's Rights, Inc.  
404 Park Avenue South  
New York, NY 10016

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COUNSEL FOR PLAINTIFFS

EXHIBIT

tabbles

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1 A. Can you rephrase it.

2 Q. (By Mr. Thompson) Are you aware that in  
3 certain counties, the practice is to place children  
4 when they come into foster care in an emergency  
5 shelter first?

6 A. I don't have direct knowledge of that.

7 Q. Are you aware of children in DHS custody  
8 being placed in any shelters that are not licensed  
9 by the division?

10 A. Can you give me an example?

11 Q. No. I'm asking you if you're aware of  
12 any unlicensed shelters where children in DHS  
13 custody have been placed?

14 A. I think there's one shelter that is  
15 connected to the court. That's the only one that  
16 I'm aware of.

17 Q. Do you know what county that is in?

18 A. I believe it's Harrison.

19 Q. And your understanding is that that  
20 shelter is not licensed by DHS?

21 A. That's correct.

22 Q. In terms of the licensing shelters, what  
23 is it that, what are the requirements that your  
24 staff is responsible for ensuring compliance with?

25 A. Well, there are numerous standards and